

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN DIVISION**

**IN RE: Valsartan N-Nitrosodimethylamine
(NDMA), and Irbesartan Products Liability
Litigation**

This Document Relates to All Actions

**MDL No. 2875
Civil No. 19-02875 (RBK/JS)**

Civil No. 20-10170

SPECIAL MASTER ORDER NO. 61

NOW, this 20th day of January, 2022, the parties having reached an impasse on the duration of the depositions of John L. Quick and Rena Conti, Ph.D., designated by Plaintiffs as expert witnesses to express opinions on class certification issues, with Plaintiffs insisting that the depositions be completed within the seven (7) hour presumptive limit for depositions stipulated by Fed.R.Civ.P.30(d)(1), and Defendants requesting that they be allowed ten (10) hours of deposition time for each witness; and having carefully considered the letter briefs of Plaintiffs (ECF No. 1866) and Defendants (ECF No. 1872) addressing the duration of the depositions; and having reviewed the comprehensive reports of Mr. Quick and Dr. Conti; and finding that they offer opinions on complex matters pertaining to compliance with “Current Good Manufacturing Practices” and damages that are claimed to exceed \$4.5 billion; and further finding that thorough questioning by a host of defendants falling within three separate

categories of entities: (1) manufacturers, (2) wholesalers, and (3) retailers, appears warranted; and concluding that, under these circumstances, Defendants have established that additional time beyond the seven hour presumptive limit set forth in Fed. R. Civ. P. 30(d)(1) is warranted to assure that Defendants have an opportunity to fairly examine Mr. Quick and Dr. Conti,

IT IS HEREBY ORDERED THAT Defendants' request to extend the duration of the depositions of Mr. Quick and Dr. Conti is **GRANTED**. The deposition of each witness may not exceed ten (10) hours. The parties shall cooperate to complete each deposition in one day, to the extent practicable, but under no circumstances shall the depositions take place over more than two (2) days without leave of court.

s/ Thomas I. Vanaskie
Hon. Thomas I. Vanaskie (Ret.)
Special Master